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June 15, 2000

By Messenger

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: **CC Docket No. 96-98; 248 NPA Relief Petition**

Dear Ms. Salas:

Enclosed for filing please find the petition of NeuStar, Inc, the North American Numbering Plan Administrator, on behalf of the Michigan telecommunications industry, for approval of a relief plan for the 248 area code.

Pursuant to Section 1.51(c) of the Commission's rules, an original and four copies of this letter are provided to the Secretary for inclusion in the record in the above-captioned proceeding.

Respectfully submitted,



Kimberly D. Wheeler
Counsel to NeuStar, Inc.

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Numbering Plan Area Relief Planning)	CC Docket No. 96-98
for the 248 Area Code)	
)	
)	

**PETITION OF THE
NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR
ON BEHALF OF THE MICHIGAN TELECOMMUNICATIONS INDUSTRY**

NeuStar, Inc. ("NeuStar"), in its role as the North American Numbering Plan Administrator ("NANPA") and acting on behalf of the Michigan telecommunications industry ("Industry"),¹ hereby petitions the Federal Communications Commission ("FCC") for approval of an all-services distributed overlay relief plan for the 248 Numbering Plan Area ("NPA").² NeuStar files the instant petition ("Petition") with the FCC because the Michigan Public Service Commission ("PSC") has taken the position that it does not have jurisdiction over NPA relief activities.³ Because of the pending exhaust of the 248 NPA and to ensure that there will be sufficient time to implement and complete the overlay relief plan prior to exhaust of the 248 NPA, NeuStar requests expedited treatment of the instant Petition.

¹ The Industry is composed of current and prospective telecommunications carriers operating in or considering operations within the 248 NPA of Michigan.

² As the neutral third party administrator, NeuStar has no independent view regarding the relief option selected by the Industry.

³ See Letter from John Strand, Chairman, Dave Svanda, Commissioner, and Bob Nelson, Commissioner, to Yog Varma of 2/16/00, attached as Exhibit A.

I. BACKGROUND

Section 251(e)(1) of the Telecommunications Act of 1996 (“Act”)⁴ assigns plenary jurisdiction to the FCC over numbering issues pertaining to the United States. Specifically, the Act directed the FCC to create or designate an impartial entity to administer telecommunications numbering and to make such numbers available on an equitable basis. To this end, the FCC established and directed the North American Numbering Council (“NANC”),⁵ a federal advisory committee created to advise the FCC on numbering matters, to recommend an independent, non-government entity to serve as the NANPA.⁶ In October 1997, the FCC affirmed NANC’s selection of Lockheed Martin - now NeuStar⁷ - as the new NANPA.⁸ The FCC noted that NeuStar would execute numbering administration functions such as NPA relief planning and central office code (often referred to as “CO” or “NXX” code) administration which had been

⁴ 47 U.S.C. § 251(e)(1) states:

The Commission shall create or designate one or more impartial entities to administer telecommunications numbering and to make such numbers available on an equitable basis. The Commission shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States. Nothing in this paragraph shall preclude the Commission from delegating to State commissions or other entities all or any portion of such jurisdiction.

⁵ “The NANC was created under the Federal Advisory Committee Act, 5 U.S.C. App. 2 (1988), to advise the FCC and to make recommendations, reached through consensus, that foster efficient and impartial number administration.” *Numbering Resource Optimization*, Notice of Proposed Rulemaking, 14 FCC Rcd 10332, 10330 n.16 (1999).

⁶ *Administration of the North American Numbering Plan*, Third Report and Order and Third Report and Order, 12 FCC Rcd 23040, 23048 (1997) (hereinafter “Third Report and Order”).

⁷ The North American Numbering Plan administration and other numbering functions have been transferred from Lockheed Martin IMS to NeuStar, Inc. The FCC approved the transfer on November 17, 1999. *Request of Lockheed Martin Corporation and Warburg, Pincus & Co. for Review of the Transfer of the Lockheed Martin Communications Industry Services Business*, Order, FCC 99-346 (Nov. 17, 1999). The transaction closed on November 30, 1999. For convenience, the instant petition will refer to the NANPA as NeuStar.

⁸ See Third Report and Order, 12 FCC Rcd at 23041-42.

previously performed by the incumbent local exchange carriers within each geographic area.⁹ After a transition period, NeuStar assumed NPA relief planning and CO code administration responsibilities for all states. NeuStar assumed responsibility for NPA relief planning and CO code administration for Michigan beginning on February 20, 1998 and March 29, 1999, respectively.

During previous NPA relief efforts, the Michigan PSC has taken the position that it does not have jurisdiction over NPA relief activities, and informed NeuStar that it would not act on any NPA relief plans that NeuStar, on behalf of the Industry, recommended.¹⁰ During relief planning for the 810 NPA in Michigan, the PSC staff instructed NeuStar to implement NPA relief in the same fashion as prior relief efforts; *i.e.* for Industry members to decide upon and implement appropriate NPA relief. The FCC, however, questioned whether NANPA and the Industry could proceed with the implementation of NPA relief plans when the state regulatory authority disavowed

⁹ See *Id.* at 23051-52.

¹⁰ In concluding that it does not have jurisdiction over NPA relief planning, the Michigan PSC relied on the Michigan Telecommunications Act (“Michigan Act”) which provides that “[e]xcept as otherwise provided by this act, the [PSC] shall not have the authority over a telecommunication service not specifically provided for in this act.” M.C.L.A. § 484.2401(2) (1999). The Michigan Act also mandates that “[i]n administering this act, the [PSC] shall be limited to the powers and duties prescribed by this act.” *Id.* § 484.2201(2). The Michigan Act, which was passed in 1995, fails to specifically refer to NPA relief as within the PSC’s authority. The Michigan legislature, however, prior to the enactment of the Michigan Act, enumerated the general powers and jurisdiction of the PSC as “to hear and pass upon all matters pertaining to, necessary, or incident to the regulation of public utilities, including... communications agencies.” *Id.* at § 460.6.

jurisdiction. Accordingly, NANPA filed a petition with the FCC seeking approval of a relief plan recommended by the Industry for the 810 NPA.¹¹

The 1999 Central Office Code Utilization Survey (“COCUS”) projections for CO code demand indicated that the 248 NPA was projected to exhaust during the first quarter of 2000.¹² Based upon the projected exhaust date and due to an unexpected increase in the demand for CO codes in the 248 NPA,¹³ on May 17, 1999, NANPA declared the 248 NPA to be in jeopardy¹⁴ and notified the Industry and the PSC accordingly.¹⁵ Pursuant to the CO Code Assignment Guidelines, NANPA facilitated an Industry meeting on June 2, 1999, to discuss and develop a plan for rationing CO codes to extend the life of the 248 NPA until relief could be implemented. The Industry adopted final jeopardy

¹¹ See *Numbering Plan Area Relief Planning for the 810 Area Code*, CC Doc. No. 96-98, Petition of the North American Numbering Plan Administrator on Behalf of the Michigan Telecommunications Industry (filed March 15, 2000). This petition is pending before the FCC. Similarly, NANPA filed a petition with the FCC seeking approval of a relief plan for the 616 NPA after the Michigan PSC denied having jurisdiction over NPA relief planning. See *Numbering Plan Area Relief Planning for the 616 Area Code*, CC Doc. No. 96-98, Petition of the North American Numbering Plan Administrator on Behalf of the Michigan Telecommunications Industry (filed April 20, 2000). This petition is also pending before the FCC. NANPA is filing contemporaneously with the FCC relief petitions for the Michigan 313, 517 and 734 NPAs.

¹² 1999 COCUS and NPA Exhaust Analysis (May 26, 1999) (“1999 COCUS”). The 1999 COCUS can be accessed on the NANPA web site at <<http://www.nanpa.com>>.

¹³ See Exhibit B for the recent history of CO code assignments in the 248 NPA. Exhibit C sets forth the recent history of CO code activity in the 248 NPA by rate center.

¹⁴ A jeopardy condition exists when the “forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief.” Central Office Code (NXX) Assignment Guidelines, § 9.3 (INC 95 0407-008, Apr. 11, 2000) (“CO Code Assignment Guidelines”). The CO Code Assignment Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

¹⁵ Interim jeopardy procedures, which provide for the assignment of only three CO codes per month, were implemented immediately upon declaration of jeopardy. Pursuant to the CO Code Assignment Guidelines, the interim procedures, including the rationing of three CO codes per month, continue in effect until the Industry agrees upon the terms of the final jeopardy procedures.

procedures, establishing the rationing quantity of seven CO code assignments per month, beginning June 9, 1999.¹⁶ Based upon the final jeopardy procedures and the factors, the 248 NPA is currently projected to exhaust during the second quarter of 2001.¹⁷

Following the establishment of final jeopardy procedures, NANPA notified the Industry and the PSC on May 28, 1999 that relief planning for the 248 NPA needed to be addressed.¹⁸ The Industry met on July 14, 1999 in Romulus, Michigan¹⁹ to discuss relief alternatives for the 248 NPA.²⁰ Pursuant to the NPA Relief Planning Guidelines, NANPA presented an Initial Planning Document (“IPD”) to the Industry prior to the relief planning meeting.²¹ The IPD set forth four relief alternatives: 1) an all-services distributed overlay – referred to as Alternative #1 in the IPD; 2) a geographic split – referred to as Alternative #2; 3) an all-services distributed overlay in which a new NPA would be overlaid upon the 248 and 313 NPAs – referred to as Multiple Alternative #1;²² and 4) an all-services distributed overlay in which a new NPA code would be overlaid

¹⁶ A copy of the Final Jeopardy Procedures adopted by the Industry at the June 2 meeting are attached as Exhibit D.

¹⁷ 2000 COCUS and NPA Exhaust Analysis (May 23, 2000) (“2000 COCUS”). The 2000 COCUS can be accessed on the NANPA web site at <<http://www.nanpa.com>>.

¹⁸ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, November 8, 1999) (“NPA Relief Planning Guidelines”). The NPA Relief Planning Guidelines assist NANPA, the Industry and regulatory authorities within a particular geographic area in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <<http://www.atis.org/atis/clc/inc/incdocs.htm>>.

¹⁹ A copy of the meeting minutes, including a list of participants, is attached as Exhibit E.

²⁰ The Michigan Industry also considered relief planning for the 313 and 734 NPAs in conjunction with the 248 NPA during the July 14, 1999 meeting.

²¹ A copy of the IPD is attached as Exhibit F.

²² The 313 NPA is adjacent to and south-east of the 248 NPA. At the time of the Industry meeting, the 1999 COCUS projections for CO code demand indicated that the 313 NPA was projected to exhaust during the first quarter of 2001. The 2000 COCUS projects that the 313 NPA will exhaust during the first quarter of 2002.

upon the 248, 313, and 734 NPAs – referred to as Multiple Alternative #2.²³ Prior to the relief planning meeting, an Industry member proposed an alternative in which a wireless only overlay would be overlaid upon the 248 NPA. The Industry did not propose any additional alternatives for consideration.

At the July 14 meeting, the participants discussed the five alternatives and reached consensus to recommend Alternative #1, an all-services distributed overlay, as the preferred means of relief for the 248 NPA. In reaching its decision, the Industry eliminated from consideration the wireless only overlay because FCC regulations do not permit service specific overlays.²⁴ The Industry recommended an all-services distributed overlay because the 248 NPA currently is divided into the smallest practical area without dividing communities of interest. Overlays minimize customer confusion and do not require existing customers to change their telephone numbers.

On June 3, 2000, NANPA notified the Michigan PSC of the Industry's recommendation and requested that the PSC inform NANPA of its decision to exercise jurisdiction in this matter within seven days of receiving the notification or NANPA would file the Industry's recommended relief plan for the 248 NPA with the FCC. The Michigan PSC notified NANPA that it did not have jurisdiction over NPA relief proceedings.²⁵ Therefore, NANPA files the instant Petition seeking FCC approval.²⁶

²³ The 734 NPA is adjacent to and south-west of the 248 NPA and west of the 313 NPA. At the time of the Industry meeting, the 1999 COCUS projections for CO Code demand indicated that the 734 NPA would exhaust during the second quarter of 2000. The 2000 COCUS projects that the 734 NPA will exhaust during the second quarter of 2001.

²⁴ 47 C.F.R. § 52.19(c)(3)(i) (1999).

²⁵ See Exhibit A.

²⁶ See NPA Relief Planning Guidelines § 2.10 (stating that the appropriate regulatory commission (*e.g.*, state, province, country) has the ultimate authority to approve or reject a relief plan); *see also* 47 C.F.R. § 52.19(a) (stating that state commissions may resolve matters involving the introduction of new area codes within their states).

II. DESCRIPTION OF THE PROPOSED ALL-SERVICES DISTRIBUTED OVERLAY RELIEF PLAN

The all-services distributed overlay plan would overlay a new area code over the same geographic area covered by the existing 248 NPA. All existing customers would retain their 248 area code and would not be required to change their telephone numbers. Consistent with FCC regulations, the Industry reached consensus to implement a 10 or 1+10-digit local dialing plan for calls placed both within and between the existing NPA and the overlay NPA.²⁷ CO codes in the new overlay NPA will be assigned upon request from service providers no sooner than sixty-six days prior to the effective date of the new area code. When the 248 NPA is exhausted of its supply of CO codes, all CO code assignments for the exhausted NPA will be made in the new overlay NPA.

During the July 14 meeting, Industry members reached consensus to recommend that optional 10 or 1+10 digit local dialing begin February 3, 2001 and required 10 or 1+10 digit local dialing begin May 5, 2001. Adhering to the recommended implementation schedule will avoid the denial or delay of service to telecommunications service providers' customers due to the unavailability of CO codes.

III. CONCLUSION

NeuStar, on behalf of the Industry, respectfully requests that the FCC approve the Industry's recommendation to implement an all-services distributed overlay as the means of relief for the 248 NPA. The Industry will begin implementing NPA relief once the FCC issues a final order approving the instant Petition. Because the 248 NPA is in

²⁷ 47 C.F.R. § 52.19(c)(3)(ii).

jeopardy and is projected to exhaust its supply of CO codes during the second quarter of 2001, NeuStar requests expedited review of this Petition.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Cheryl A. Tritt".

Cheryl A. Tritt
Kimberly D. Wheeler

MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006
(202) 887-1500

Counsel for NeuStar, Inc.

June 15, 2000

EXHIBIT A



State of Michigan
John Engler, Governor

Department of Consumer & Industry Services
Kathleen M. Wilbur, Director

Public Service Commission

6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909-7721
(517) 241-6180

Commissioners

John G. Strand
David A. Svanda
Robert B. Nelson

June 6, 2000

Morrison & Foerster L.L.P
2000 Pennsylvania Avenue NW
Washington D.C. , 20006-1888

Dear Ms. Wheeler:

This commission is in receipt of two documents which you submitted on June 2, 2000 identified as Relief Plans for the 517 Numbering Plan Area and the 248, 313, and 734 NPA respectively. However, as indicated by the attached letter from this commission to Mr. Yog Varma of the F.C.C. the Michigan Public Service Commission does not under existing state law have jurisdiction over Area Codes.

If you have any further questions please contact me at 517-241-6206.

Sincerely,

Dan Kearney, Supervisor
Engineering and Tariff Section

Attachment

cc: Tom Lonergan



State of Michigan
John Engler, Governor

Department of Consumer & Industry Services
Kathleen M. Wilbur, Director

Public Service Commission

6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909-7721
(517) 241-6180

Commissioners

John G. Strand
David A. Svanda
Robert B. Nelson

February 16, 2000

Mr. Yog Varma
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Dear Mr. Varma:

This is to inform you of the Michigan Public Service Commission's position regarding our authority to exercise certain authority over area code assignments.

We understand your position that the states were delegated authority to supervise area code assignments in various FCC dockets including 96-333 and 97-372. However, this commission's position with respect to this issue has been consistent and was made clear to NeuStar (formerly Lockheed Martin IMS) representatives Stan Washer, Dan Gonas, and Sandy Tokarek on numerous occasions. This commission did not notify the FCC that it would take on the responsibility for area code relief. It was our understanding that area code initiation and development functions would be transferred to and performed by the new NANPA administrator as referenced in FCC97-372, which we believed became automatic after the 120 day notification period expired. We were never advised by the FCC that by remaining silent the states were to be delegated new responsibilities.

In any event, the Michigan Public Service Commission can only exercise that authority which has been specifically delegated to it by the State Legislature via the Michigan Telecommunications Act. We realize that the Michigan Act may differ in many respects from those which govern the authority of other state commissions, however these differences were also made clear to the representatives from NeuStar who apparently did not communicate this situation to your office until recently.

The Public Service Commission continues to believe that, notwithstanding the FCC delegation, the Michigan Telecommunications Act does not provide the necessary jurisdiction for the Commission to accept the permissive delegation of federal authority.

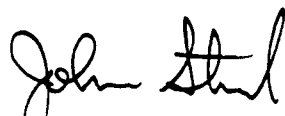
As a practical matter, Neustar has already developed and is implementing 5 area code plans in concert with the telecommunications providers in this state. Michigan has also gone through 2 area code splits since the FCC order in 97-372, and these area code splits have occurred satisfactorily without our supervision.

Mr. Yog Varma
Page 2

February 16, 2000

We do intend, however, to seek the necessary state authority as the Michigan Telecommunications Act is reviewed for amendment or replacement in advance of its sunset on 12/31/2000.

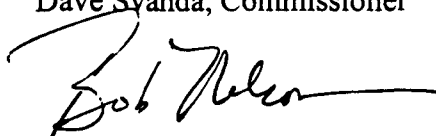
Sincerely,

A handwritten signature in black ink, appearing to read "John Strand".

John Strand, Chairman

A handwritten signature in black ink, appearing to read "Dave Syanda".

Dave Syanda, Commissioner

A handwritten signature in black ink, appearing to read "Bob Nelson".

Bob Nelson, Commissioner

EXHIBIT B

EXHIBIT B

STATUS OF CENTRAL OFFICE CODES IN THE 248 AREA CODE

<u>Status</u>	<u>Number of CO Codes</u>
Assigned NXXs	668
Protected	0
Reserved	1
Hold	0
Test NXXs	7
Unavailable NXXs	13
Available NXXs	111
Total	800

CO Codes Assigned Per Month

<u>Apr-99</u>	<u>May-99</u>	<u>June-99</u>	<u>July-99</u>	<u>Aug-99</u>	<u>Sept-99</u>	<u>Oct-99</u>	<u>Nov-99</u>
15	0	3	0	5	4	9	7
<u>Dec-99</u>	<u>Jan-00</u>	<u>Feb-00</u>	<u>Mar-00</u>	<u>Apr-00</u>	<u>May-00</u>		
10	14	10	0	16	8		

Prepared by Cheryl Dixon
NANPA CO Code Administration
June 5, 2000

EXHIBIT C

248 NPA (Michigan)
Final Jeopardy Procedures
Extraordinary Code Conservation Measures

Introduction

This document describes Extraordinary Code Conservation Measures for managing central office codes (NXXs) for the duration of the jeopardy condition in this NPA. The purpose of this document is to ensure that all pertinent information is readily available to current and potential code holders. These procedures attempt to provide...

- fair and equitable treatment for all segments of the telecommunications industry
- the most effective means of managing the limited number of unassigned NXXs
- a selection of NPA-specific options for local industry consideration

Questions

Questions regarding the content of this document may be directed to either the NANPA CO Code Administrator or the NANPA NPA Relief Planner. (Refer to the NANPA Web site, www.nanpa.com, for specific contact information.)

Introduction of New NPA

Planning Timeline	
Relief Milestones	Key Dates
• Date on which this NPA was declared to be in Jeopardy	Jeopardy declared <i>5/17/99</i>
• Estimated/Actual Permissive Dialing Period Begins (Overlay or Split)	23 months from date jeopardy declared (Notes 1 & 2)
• Estimated/Actual Mandatory Dialing of New NPA Begins (Overlay or Split)	26 months from date jeopardy declared (Notes 1 & 2)

Notes:

Note 1: Target interval for NPA relief in order to calculate jeopardy allocation quantities

Note 2: Dates will be entered after receipt of relief plan decision from State Regulatory Commission

248 NPA (Michigan)
Final Jeopardy Procedures
Extraordinary Code Conservation Measures

Submitting Code Requests

<p style="text-align: center;">Table A Key Dates and Requirements</p>		
Row	Key Points	Requirement
A.	Implementation of Extraordinary Code Conservation Measures	Code Conservation allocation begins 6/9/99
B.	Minimum quantity of codes available for assignment ("base allocation"):	7 NXXs assigned per month (See Note 1)
C.	Maximum requests that may be submitted per month ("monthly submissions"):	3 requests allowed per OCN/Entity (See Note 2)
D.	Last day and time code requests will be accepted ("submission deadline"):	Part 1 received no later than... 17th business day, 4:00 p.m., Pacific (day and time established by NANPA***)
E.	First day and time code requests will be accepted ("submission start date"):	Part 1 received no earlier than... 7th business day, 8:00 a.m., Pacific (day determined by local NPA industry**)
F.	Part 1 code requests to be faxed to NANPA CO Code Administrator:	Gary Zahn Fax #: 925-363-8753 Phone: 925-363-8761
G.	Requirements for participating in monthly allocation process:	Each request must meet all "Eligibility Requirements" (See Note 3a & Note 3b)
H.	When and how applicants will be notified of the disposition of their code request(s):	Part 3 issued on or before the end of the 10 th business day (Pacific Time) after the submission deadline (Note 4)
I.	Process that will be used to allocate available codes:	Monthly allocation process is identified on Table B & Table C.
J.	Code effective date for requests receiving an NXX assignment:	Effective date no less than 52 calendar days after NXX assigned (See Note 5)
K.	Method by which initial, growth and "new application" requests will receive a code:	Industry Option: Per industry consensus, we will use the one-pool option. (See Note 6)

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******* *“Submission Deadline” is the date on which the industry-standard 66-day processing interval begins*
****** *“Submission Start Date” sets the “submission interval” (period during which requests will be accepted)*

248 NPA (Michigan)
Final Jeopardy Procedures
Extraordinary Code Conservation Measures

Table A, Note 1 – “Base Allocation”:

- 1) Any part of a base allocation that is not assigned in an allocation month will carryover for assignment in the following month.
- 2) “Base allocation” is determined by dividing the number of codes available for assignment at implementation of these procedures by the estimated number of months remaining until the target start of mandatory dialing.
 - a) The base allocation quantity may be revised, upward or downward, depending upon the relief plan and schedule approved/ordered by the state Regulatory Commission.
- 3) In the event that NXXs are recovered during the jeopardy period, the “base allocation” will be recalculated to reflect the larger number of available codes.
 - a) The CO Code Administrator may adjust the monthly allocation as a result of code recovery without seeking industry consensus.
 - b) The CO Code Administrator will post on the NANPA Web site a notice of recalculated monthly allotment and provide a faxed notification. It is the responsibility of each code applicant to check the NANPA Web site, www.nanpa.com, at least monthly for such notice.

Table A, Note 2 – “Monthly Submissions”:

- 1) NXX codes will not be reserved.
- 2) Requests are to be specified as 1st, 2nd, up to “3rd” choice (where “3” represents the maximum number of requests that may be submitted per OCN).
 - a) If an applicant submits multiple requests, but does not specify “choice,” the code administrator will assign 1st, 2nd, up to 3rd choice based on the sequence in which the requests were received on the NANPA Code Administrator’s fax machine.
 - b) If an applicant submits more than “3” code requests (the maximum permitted), only the first “3” received will be accepted; any additional requests received that calendar month will be denied.

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Final Jeopardy Procedures
Extraordinary Code Conservation Measures

Table A, Note 3a – “Eligibility Requirements, Basic Data”:

A code request must meet all eligibility requirements by the monthly “submission deadline” in order to be eligible to participate in that month’s code allocation process.

- 1) The Part 1 code request must be complete and accurate.
 - a) A valid NPA/LATA association must be provided.
 - b) A valid Rate Center/NPA association must be provided.
 - c) On the requested effective date, the specified rate center must physically reside within the boundaries of the specified NPA.
 - d) If the requested rate center will be moving to a new NPA and the requested effective date falls within the NPA split permissive dialing period, then the new NPA must be specified.
- 2) The specified OCN (Operating Company Number) must be validly assigned to the applicant.
 - a) Companies “doing business as” another company must have a “d/b/a/” memo on file with the NANPA CO Code Administrator specifying affected company names and OCNs.
- 3) The code applicant must be certified to provide service in the requested NPA/rate center.
 - a) The type of certification (CPCN #, Docket #, letter of authorization, FCC license #, etc.) and certification date must be specified.
 - b) The type of entity requesting the service (franchised local exchange carrier, competitive local exchange service carrier, cellular company, paging company, PCS, etc.) must be specified.
 - c) The type of service to be provided by the requested code (end office, paging, cellular, PCS, etc.) must be specified.
- 4) The requested effective date may be no more than 6 months after the “submission deadline.”
- 5) Requests for a “growth” code must include the Months to Exhaust (“MTE”) Worksheet.
- 6) Requests received after the submission deadline in any given month will be included in the following month’s allocation process provided that all “Eligibility Requirements” have been met by that next month’s submission deadline.

248 NPA (Michigan)
Final Jeopardy Procedures
Extraordinary Code Conservation Measures

Table A, Note 3b – “Eligibility Requirements, Industry-Option Supporting Data”:

A code request must include/meet supporting data requirements specified by the local NPA relief planning team in order to be eligible to participate in any given month’s code allocation process.

- 1) A Jeopardy COCUS must be on file for the NPA from each OCN submitting a code request.
 - a) For current code holders, the Jeopardy COCUS is to be submitted to the NANPA Code Administrator within 30 days of jeopardy being declared.
 - b) For new market entrants, the Jeopardy COCUS is to be submitted with the code request.

(The Jeopardy COCUS is Appendix E of the **Central Office Code (NXX) Assignment Guidelines**. This form may be downloaded from the ATIS Web site)

Table A, Note 4 – “Notification of Disposition, Suspended and Denied Requests”

- 1) Requests will be suspended if complete and correct Part 1 data (or local industry-specified supporting documentation) is not received by the allocation month’s submission deadline.
 - a) The request will be ineligible for participation in the allocation process until all eligibility requirements have been met.
 - b) If a request has been suspended, but required data (or industry-specified supporting documentation) is later received by the submission deadline of a subsequent month, the request will be included in that subsequent month’s code allocation process.
- 2) Requests will be denied in the following situations:
 - a) The request is to reserve an NXX code.
 - b) The requested effective date is outside the allowable timeframe.
 - c) Code request(s) submitted by the OCN exceed the “3” per month maximum.
 - d) The applicant is not authorized/certified to provide the specified service in the requested NPA/rate center.

Table A, Note 5 – “Code Effective Date”

- 1) The Part 3 code effective date will reflect no less than 52 calendar days from the date on which the lottery is held (7 calendar days for AOCN processing and 45 calendar days for industry notification). 14 calendar days are for the CO Code processing time, which comprises the 66 days.
- 2) If an expedite is accepted, the Code Applicant must conform to all COCTTF Guidelines regarding interim expedites or replacement of interim requirements.

248 NPA (Michigan)
Final Jeopardy Procedures
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Table A, Note 6 – Industry Option: “One- versus two-pool”

- 1) ***There will be only one “pool” from which NXX code assignments will be made.***
 - a) Special consideration will be given to New Entrants.
 - b) One code per month will be issued to a new entrant on a random lottery basis. New entrants who are unsuccessful in the lottery must resubmit in subsequent months.
 - c) Applications from existing Code Holders that do not receive a code in any given month’s lottery will be suspended and carried forward to the following month. It will not be necessary to reapply, and there will be no priority numbers associated with these applications.

Code Set-Aside for Overlay

- 1) Per industry consensus at the June 2, 1999 jeopardy meeting, 15 codes will be set-aside for overlay.

248 NPA (Michigan)
Final Jeopardy Procedures
Extraordinary Code Conservation Measures

Governing Principle for Code Allocation

In any given month, each OCN submitting an eligible request will receive one code before any OCN receives two codes; each OCN submitting eligible requests for more than one code will each receive two codes before any OCN receives additional codes.

The term “Code Allocation” refers to the means of determining which code requests will receive a CO code assignment in any given month. Lottery is one method of allocation.

Code Allocation Process

Table B Code Allocation Process		
When the total number of <u>Eligible Requests</u> received by the submission deadline is...	Then available codes will be allocated each month in the following manner...	And the effect upon the subsequent month(s) allocation will be...
<i>Equal To</i> the total number of codes available for assignment that month	Each request receives an NXX assignment	No effect; each available code will be assigned
<i>Less Than</i> the total number of codes available for assignment that month	Each request receives an NXX assignment	Remaining quantity of codes will carryover to the following month

Note: See Table C if the total number of eligible requests is Greater Than available codes

248 NPA (Michigan)
Final Jeopardy Procedures
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Table C Code Allocation Process				
When Eligible Requests are Greater Than the number of available codes...		The following restrictions will apply...	Codes will be allocated in this manner...	And the effect on the following month will be...
<i>If the total number of OCNs submitting eligible Requests is...</i>	<i>Equal To</i> codes available for assignment that month	2 nd - and 3rd-choice code requests will be denied	Each OCN receives one NXX assigned to their 1 st -choice request	No effect; each available code will be assigned
	<i>Less Than</i> codes available for assignment that month	No restrictions	a) Each OCN receives at least one NXX assigned to their 1 st -choice request b) Lottery will be used to determine which OCN(s) receive the remaining code(s)	Any unassigned code quantity will carryover to the following month
	<i>Greater Than</i> codes available for assignment that month	2 nd - and 3rd-choice code requests will be denied	a) Only eligible 1st-choice requests will participate in the allocation process b) Lottery will be used to determine which OCN(s) receive a code assignment c) Some OCNs will receive an NXX; others will not	1st choice requests that do not receive a code will be carried over to the following month; priority numbers will not be assigned.

248 NPA (Michigan)
Final Jeopardy Procedures
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Priority Numbers Option

- a) Per industry consensus, the priority numbers option will not be used.

Modifications to These Procedures

These procedures will be modified in the following circumstances:

- 1) If, during Industry relief planning meetings, consensus is reached to add, modify or delete specific dates and intervals identified on Table A through Table C.
- 2) Jeopardy meetings may be reconvened pursuant to the current COCTTF procedures for modification to industry agreements.

EXHIBIT D

EXHIBIT C

248 AREA CODE CENTRAL OFFICE CODE ACTIVITY BY RATE CENTER APRIL 1999-MAY 2000

Rate Center	April-99	May-99	June-99	July-99	August-99	Sept.-99	Oct.-99	Nov.-99	Dec.-99	Jan.-00	Feb.-00	March-00	April-00	May-00
Auburn Heights	1 assigned						1 assigned	2 assigned		1 assigned			1 assigned	
Birmingham	1 assigned				1 assigned					2 assigned			2 assigned	2 assigned
Clarkston	1 assigned							1 assigned						1 assigned
Commerce	1 assigned							1 assigned	1 assigned					
Drayton Plains								1 assigned	1 assigned	1 assigned				
Farmington	1 assigned				1 assigned				1 assigned				2 assigned	
Holly			1 assigned				1 assigned	1 assigned	1 assigned	1 assigned				
Lake Orion	1 assigned								2 assigned					
Milford White Lake														
Northville	1 assigned					1 assigned	2 assigned	1 assigned	1 assigned				1 assigned	1 assigned
Ortonville														
Oxford	1 assigned								1 assigned	1 assigned				
Pontiac	1 assigned		1 assigned 1 returned		1 assigned	2 assigned	1 assigned			2 assigned			3 assigned	
Rochester	1 assigned						1 assigned							
Royal Oak			1 assigned			1 assigned	1 assigned			1 assigned			4 assigned	2 assigned
South Lyon										2 assigned			1 assigned	
Southfield	1 assigned								1 assigned	3 assigned	3 assigned		2 assigned	1 assigned

Troy	2 assigned				2 assigned		1 assigned				4 assigned			1 assigned
Walled Lake	1 assigned						1 assigned				1 assigned			
West Bloomfield	1 assigned								1 assigned		2 assigned			
TOTAL	15 assigned 0 returned	0 assigned 0 returned	3 assigned 1 returned	0 assigned 0 returned	5 assigned 0 returned	4 assigned 0 returned	9 assigned 0 returned	7 assigned 0 returned	10 assigned 0 returned	14 assigned 0 returned	10 assigned 0 returned	0 assigned 0 returned	16 assigned 0 returned	8 assigned 0 returned

EXHIBIT E

**Minutes
248, 313, 734 NPA Relief
Initial Planning Meeting
July 14, 1999**

ATTENDANCE

Ann Henderson, Ben Childers, Brad Grove, Clint Duke, Dale Fox, Dan Gonos, Dan Kearney, Dee Kelly, Denise Spires, Fred Westerfield Gary Frey, Jim Deak, Joe Hurlbert, Kelly Faul, Matt Skolund, Paula Jordan, Rackeline Hoff, Sandy Tokarek, Scott Temple, Tom Cisney and Tracey Willett, Burke Gaddis.

WELCOME AND INTRODUCTIONS

Sandy Tokarek, Lockheed Martin Senior NPA Relief Planner, opened the meeting with introductions and objectives of the meeting.

Ms. Tokarek did not review the NANPA update or guidelines since there were no new attendees from the July 13th meeting and consensus was reached to expedite the meeting process.

INITIAL PLANNING DOCUMENT REVIEW

Ms. Tokarek reviewed the recent NXX code assignments and the protected code list.

The Initial Planning Document (IPD) was reviewed and discussed by the industry.

248 NPA

The all services overlay, Alternative #1, was reviewed, including the projected life of the overlay. The geographic split, Alternative #2, was discussed.

ADDITIONAL ALTERNATIVES FROM INDUSTRY

Multiple Alternate #3 (for all three NPAs): Omnipoint proposal for a wireless only overlay was previously distributed. Motion to remove the Multiple Alternative #3 because it is anti-competitive and against the FCC rules. Consensus reached to remove the Multiple Alternative #3 from consideration.

No additional alternatives were offered.

A motion was made to remove the split alternative from consideration. Consensus reached.

The motion was made to remove the combining of 248 and 313 as an overlay, the remaining two multiple overlays (alternative #1 and #2). Consensus was reached to remove the multiple alternatives from consideration.

RECOMMENDED RELIEF ALTERNATIVE

Motion for an all services overlay for the 248 NPA was made. Consensus reached.

313 NPA

The all services overlay, Alternative #1, was reviewed, including the projected life of the overlay.

The geographic split, Alternative #2, was discussed.

ADDITIONAL ALTERNATIVES FROM INDUSTRY

No additional alternatives were offered.

DISCUSS ALTERNATIVES

The attributes of the overlay and geographic split were discussed.

RECOMMENDED RELIEF ALTERNATIVE

Motion for an all services overlay for the 313 NPA was made. Consensus reached.

734 NPA

The all services overlay, Alternative #1, was reviewed, including the projected life of the overlay.

The geographic split, Alternative #2, was discussed.

DISCUSS ALTERNATIVES

The attributes of the overlay and geographic split were discussed.

ADDITIONAL ALTERNATIVES FROM INDUSTRY

No additional alternatives were offered.

DISCUSS ALTERNATIVES

The attributes of the overlay and geographic split were discussed.

RECOMMENDED RELIEF ALTERNATIVE

Motion was made for approval of the overlay for 734 and for elimination of split alternative. Consensus reached. MCI WorldCom opposed.

DIALING PLAN

10 or 1+10 digits, service providers will educate their customers to their dialing pattern.

REASONS FOR RECOMMENDATIONS

- 1) already split areas to smallest practical/political geographic areas
- 2) eliminates need for any telephone number change
- 3) minimizes the need for changes in stationery, business cards and advertising
- 4) minimizes customer confusion

SET ASIDE CODES FOR OVERLAY

The need to set aside certain numbers of codes for new entrants in the overlay relief was discussed.

Fifteen set aside codes for each overlay was proposed. Consensus was reached for fifteen set aside codes for each recommended overlay relief.

IMPLEMENTATION SCHEDULE

The following timetable was proposed:

	248	313	734
Optional Dialing	2/3/01	2/3/01	2/3/01
Required Dialing	5/5/01	11/10/01	8/18/01

A discussion ensued as to the appropriateness of adopting proposed implementation dates later than the COCUS projected exhaust dates. Area 911 system considerations were discussed.

Proposal called for the proposed dates for the 248 NPA. Two opposed. Consensus declared for the 248 NPA of Optional of 2/3/01 and Required of 5/5/01.

Proposal called for the 313 NPA. Six opposed. No consensus reached.

Alternate dates were discussed. Revised 313 dates to Optional of 11/4/00, Required of 2/3/01.

Proposal called. Two opposed, consensus declared.

Proposal not called for the 743 NPA.

Alternate dates were discussed. Revised 734 dates to Optional of 7/8/00, Required of 10/7/00.

Proposal called for revised dates. Consensus declared.

In summary, consensus was reached for the following implementation schedule:

	248	313	734
Optional Dialing	2/3/01	11/4/00	7/8/00
Required Dialing	5/5/01	2/3/01	11/4/00 (revised 8/11/1999)

The recommendation was made for GTE and Ameritech to consider these revised dates for the 313 and 743. Ameritech and GTE will internally review the dates and report back on the minutes review conference call.

MCI WorldCom offered a statement for the record:

MCI WorldCom opposes an overlay in the 734 NPA geographic area. This area has a larger geographic area than either the 248 or 313 NPAs. The overlay will require customers to dial the area code for all calls. The overlay also presents anti-competitive impacts not present in a split.

NANPA will prepare meeting minutes and a draft filing to be distributed by August 4.

The conference call to review meeting minutes and draft recommendation will be held on August 11.

Code request to Rose Breidenbaugh will be made by August 18.

APPROVAL OF MINUTES

It was the consensus of the industry to convene via conference call on August 11 to review the minutes and the draft recommendation.

ACTION ITEM

- 1) GTE and Ameritech will internally review the consensus dates
- 2) The consensus dates will be reviewed on the conference call.

EXHIBIT F

Initial Planning Document
For Relief of MICHIGAN 248, 313, 517 & 734 NPAs

Prepared by:
Sandy Tokarek
Senior NPA Relief Planner

North American Numbering Plan Administration
Ronald R. Conners, Director
James N. Deak, Regional Director – NPA Relief Planning

June 15, 1999

248 NPA Relief Alternatives

Overlay Alternative

Alternative #1

A new NPA code would be assigned to the same area covered by the current 248 NPA. Customers would keep their current telephone numbers; however, ten-digit local dialing would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 248 NPA all code assignments will be in the overlay area code. Projected lives 6.8 years.

NPA Split Alternatives

All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be acceptable.

Alternative #2

Pontiac Geographic Split - Pontiac rate center and rate centers southeast. Some of the larger exchanges follow:

Area A	Birmingham	Pontiac	Royal Oak	West Bloomfield
Pontiac				
(7.1 years)				

Area B	Farmington	Northville	Southfield	Troy
(6.5 years)				

313 NPA Relief Alternatives

Overlay Alternative

Alternative #1

A new NPA code would be assigned to the same area covered by the current 313 NPA. Customers would keep their current telephone numbers; however, ten-digit local dialing would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 313 NPA all code assignments will be in the overlay area code. Projected lives 5.3 years.

NPA Split Alternatives

All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be acceptable.

Alternative #2

Detroit Zone 4 & 5 Geographic Split - following the boundaries of the Detroit Zone 4 & 5 rate centers. Some of the larger exchanges follow:

Area A	Detroit Zone 4	Detroit Zone 5
Detroit 4 & 5		
(4.8 years)		
Area B	Detroit Zone 1	Detroit Zone 2
(6.0 years)		

517 NPA Relief Alternatives

Overlay Alternative

Alternative #1

A new NPA code would be assigned to the same area covered by the current 517 NPA. Customers would keep their current telephone numbers; however, ten-digit local dialing would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 517 NPA all code assignments will be in the overlay area code. Projected lives 5.1 years.

NPA Split Alternatives

All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be acceptable.

Alternative #2

LATA Geographic Split - following the boundary of 344 and 346 LATAs. Some of the larger exchanges follow:

Area A LATA 344 (4.2 years)	Bay City	Midland	Mount Pleasant	Saginaw
Area B LATA 346 (6.1 years)	Adrian	Howell	Jackson	Lansing

734 NPA Relief Alternatives

Overlay Alternative

Alternative #1

A new NPA code would be assigned to the same area covered by the current 734 NPA. Customers would keep their current telephone numbers; however, ten-digit local dialing would be required. Codes in the overlay NPA will be assigned upon request with the effective date of the new area code. At exhaust of the 734 NPA all code assignments will be in the overlay area code. Projected lives 5.3 years.

NPA Split Alternatives

All split plans would require ten-digit local dialing between NPAs in the same extended local calling area. Within an NPA, seven-digit dialing would be acceptable.

Alternative #2

East/West Geographic Split - Some of the larger exchanges follow:

Area A West (5.3 years)	Ann Arbor	Monroe	Ypsilanti	
Area B East (5.2 years)	Belleville Romulus	Flat Rock Trenton	Livonia Wayne	Plymouth

Multiple NPA Relief Alternatives

Overlay Alternatives

Alternative #1

A new NPA code would be assigned to the same area covered by the current 248 & 313 NPAs. Customers would keep their current telephone numbers; however, ten-digit local dialing would be required. Codes in the overlay NPAs will be assigned upon request with the effective date of the new area code. At exhaust of the 248 NPA all code assignments may be in the new overlay area code. Projected lives 6.2 years.

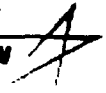
Alternative #2

A new NPA code would be assigned to the same area covered by the current 248, 313 & 734 NPAs. Customers would keep their current telephone numbers; however, ten-digit local dialing would be required. Codes in the overlay NPAs will be assigned upon request with the effective date of the new area code. At exhaust of the 248 NPA all code assignments may be in the new overlay area code. Projected lives 2.2 years.

NPA 248 Rate Center Map

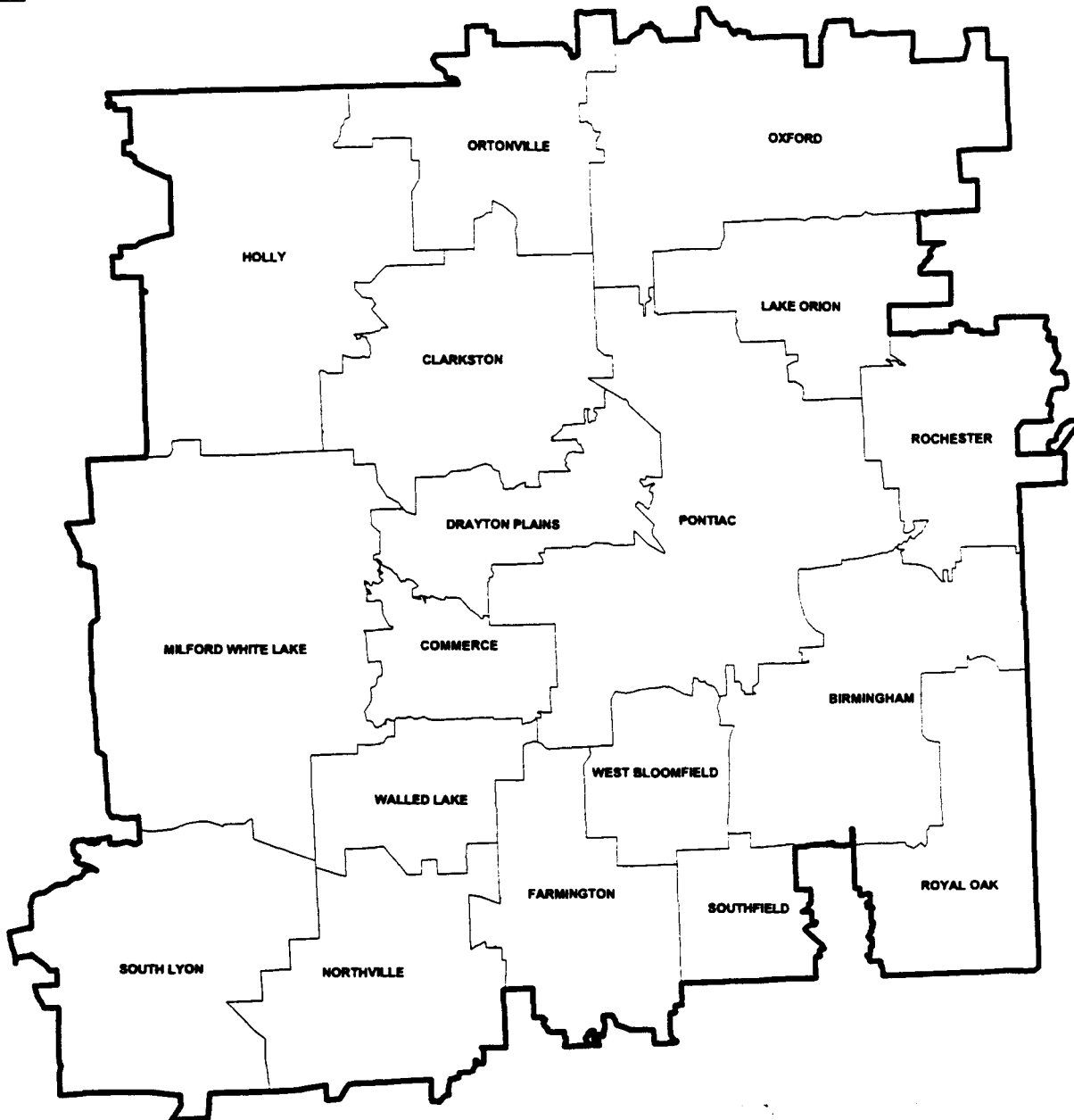
Alternative # 1 OVERLAY

LOCKHEED MARTIN



NPA 248 Legend

- NPA Boundary
- Rate Center Boundaries



ALTERNATIVE	PROJECTED_LIVES
ALTERNATIVE #1	PROJECTED LIVES
OVERLAY	6.8 YEARS

NPA 248 Rate Center Map

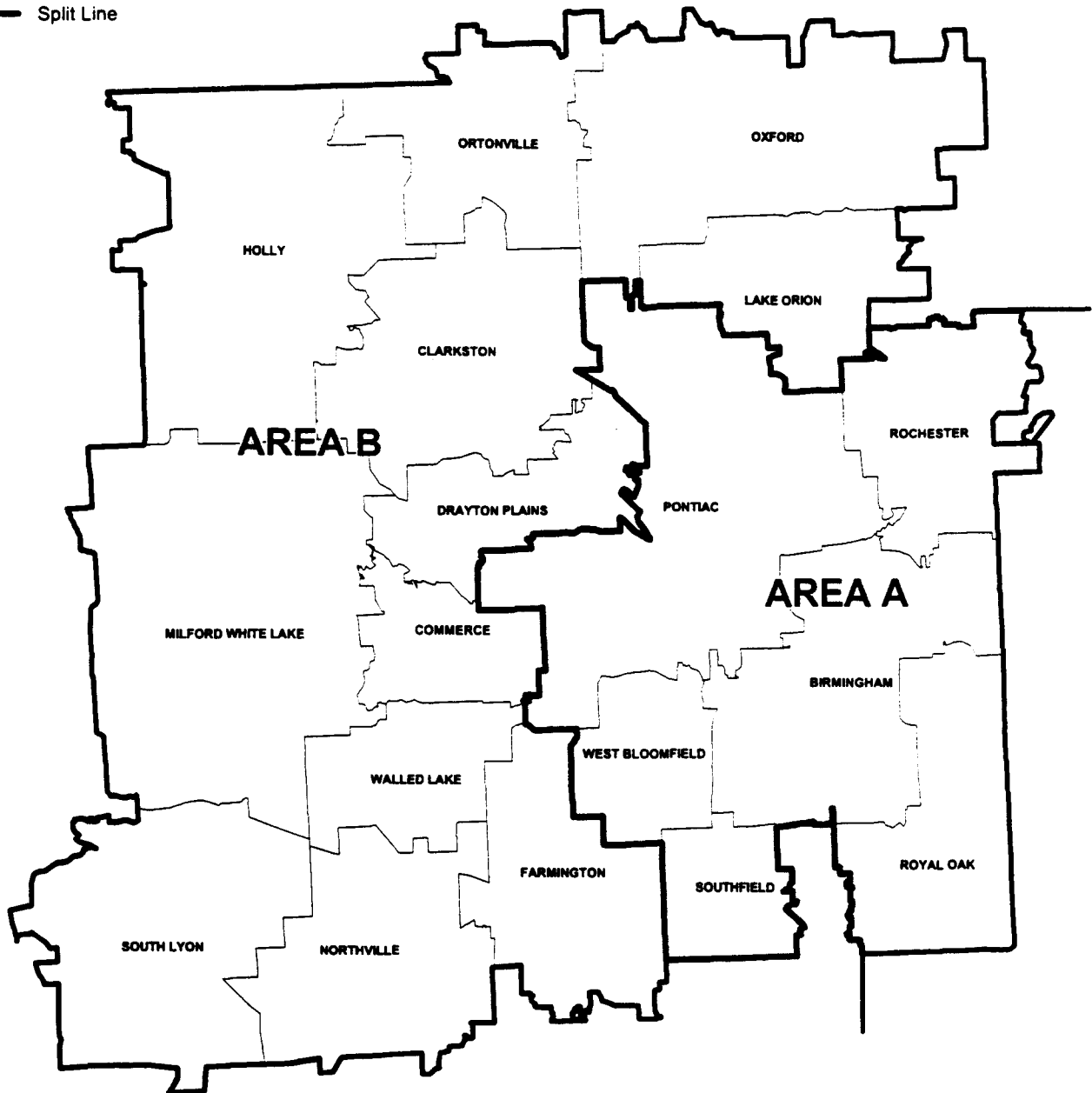
Alternative # 2 SINGLE GEOGRAPHIC SPLIT

LOCKHEED MARTIN



NPA 248 Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line



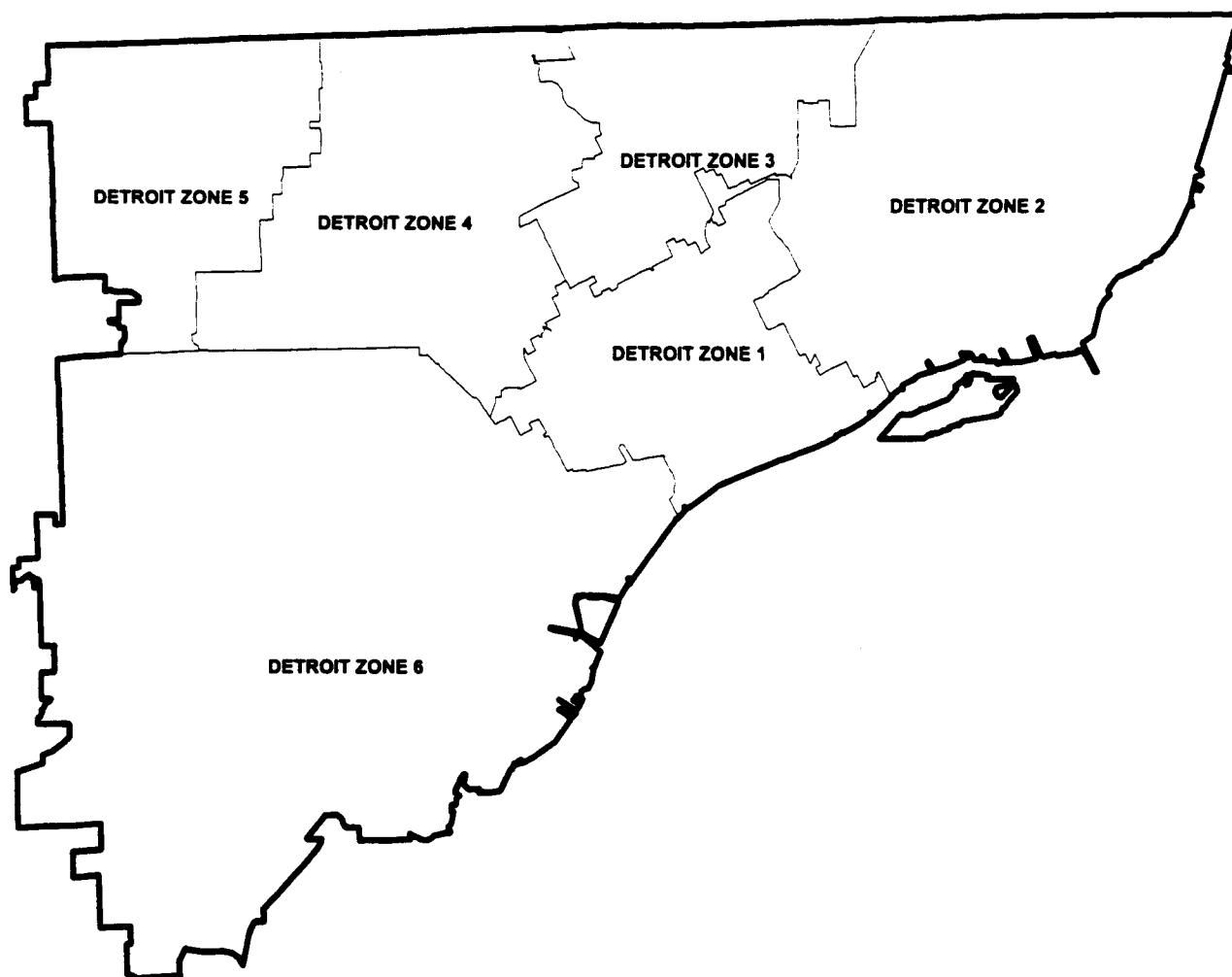
ALTERNATIVE	PROJECTED_LIVES
ALTERNATIVE #2	PROJECTED LIVES
AREA "A"	7.1 YEARS
AREA "B"	6.5 YEARS

Produced by CDS Business Mapping 6/7/99




NPA 313 Legend

-  NPA Boundary
-  Rate Center Boundaries

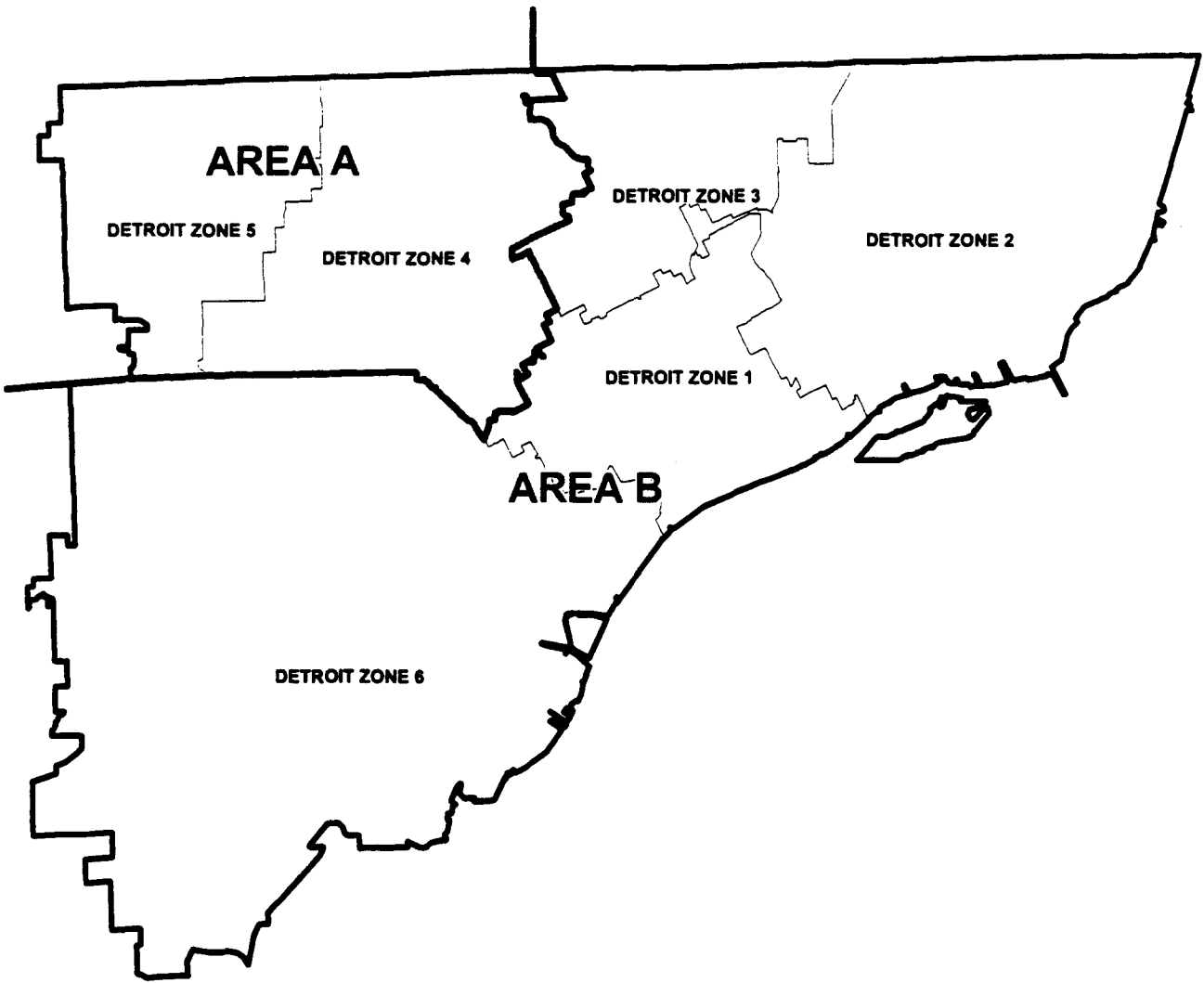
ALTERNATIVE	PROJECTED_LIVES
ALTERNATIVE #1	PROJECTED LIVES
OVERLAY	5.3 YEARS



NPA 313 Legend

-  NPA Boundaries
-  Rate Center Boundaries
-  Split Line

ALTERNATIVE	PROJECTED_LIVES
ALTERNATIVE #2	PROJECTED LIVES
AREA "A"	4.8 YEARS
AREA "B"	6.0 YEARS



NPA 517 Rate Center Map NORTH

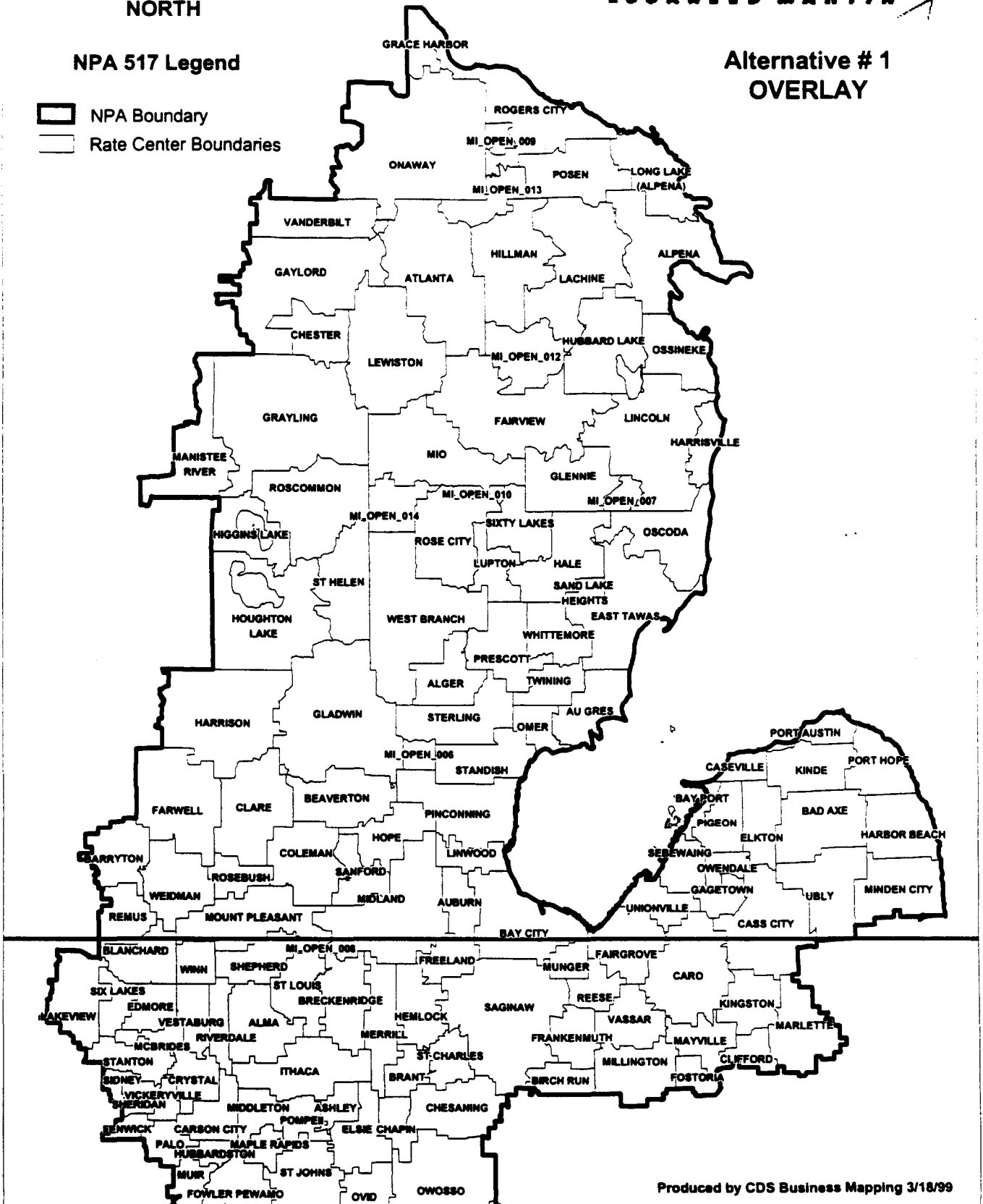
LOCKHEED MARTIN

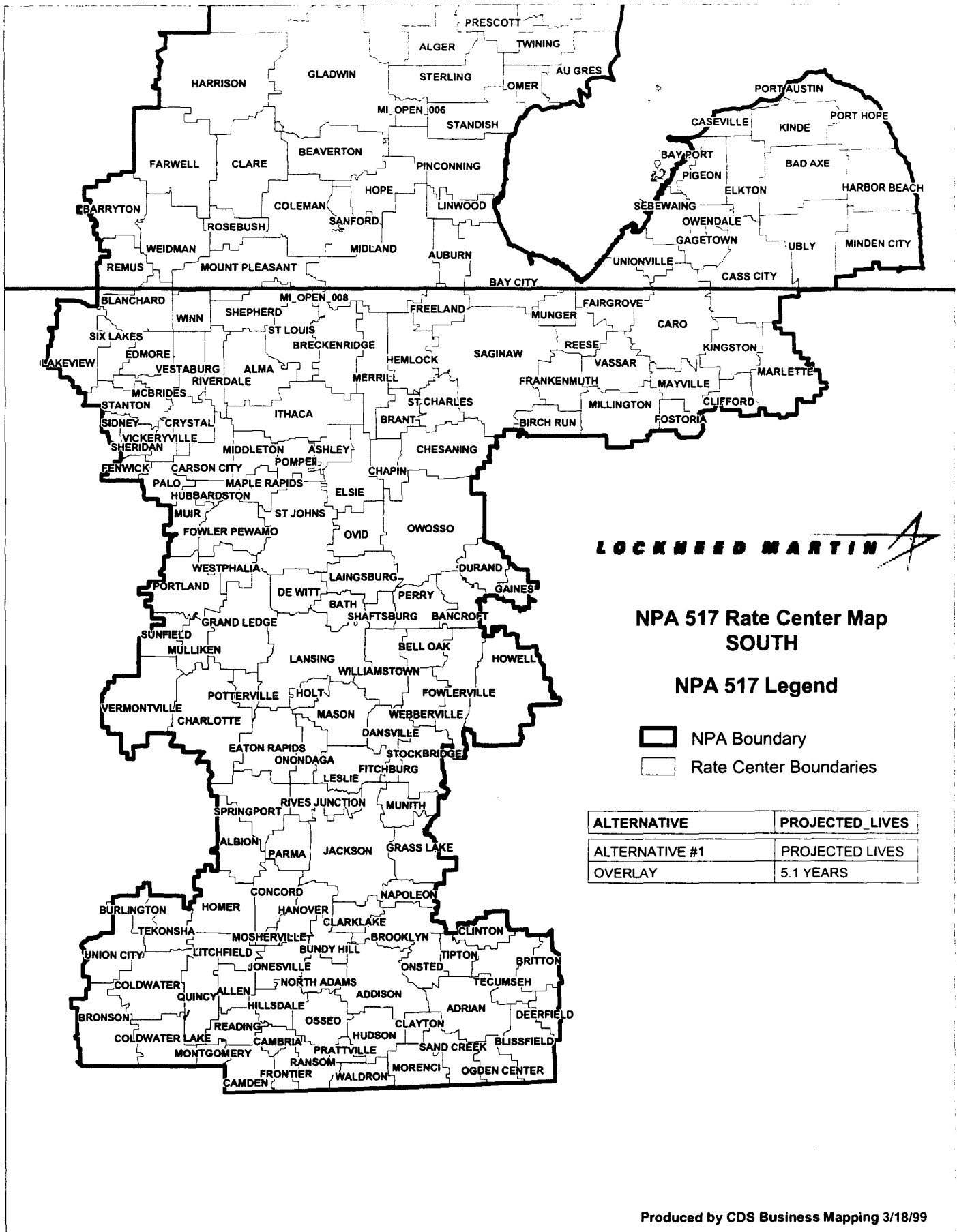


NPA 517 Legend

- NPA Boundary
- Rate Center Boundaries




Alternative # 1 OVERLAY

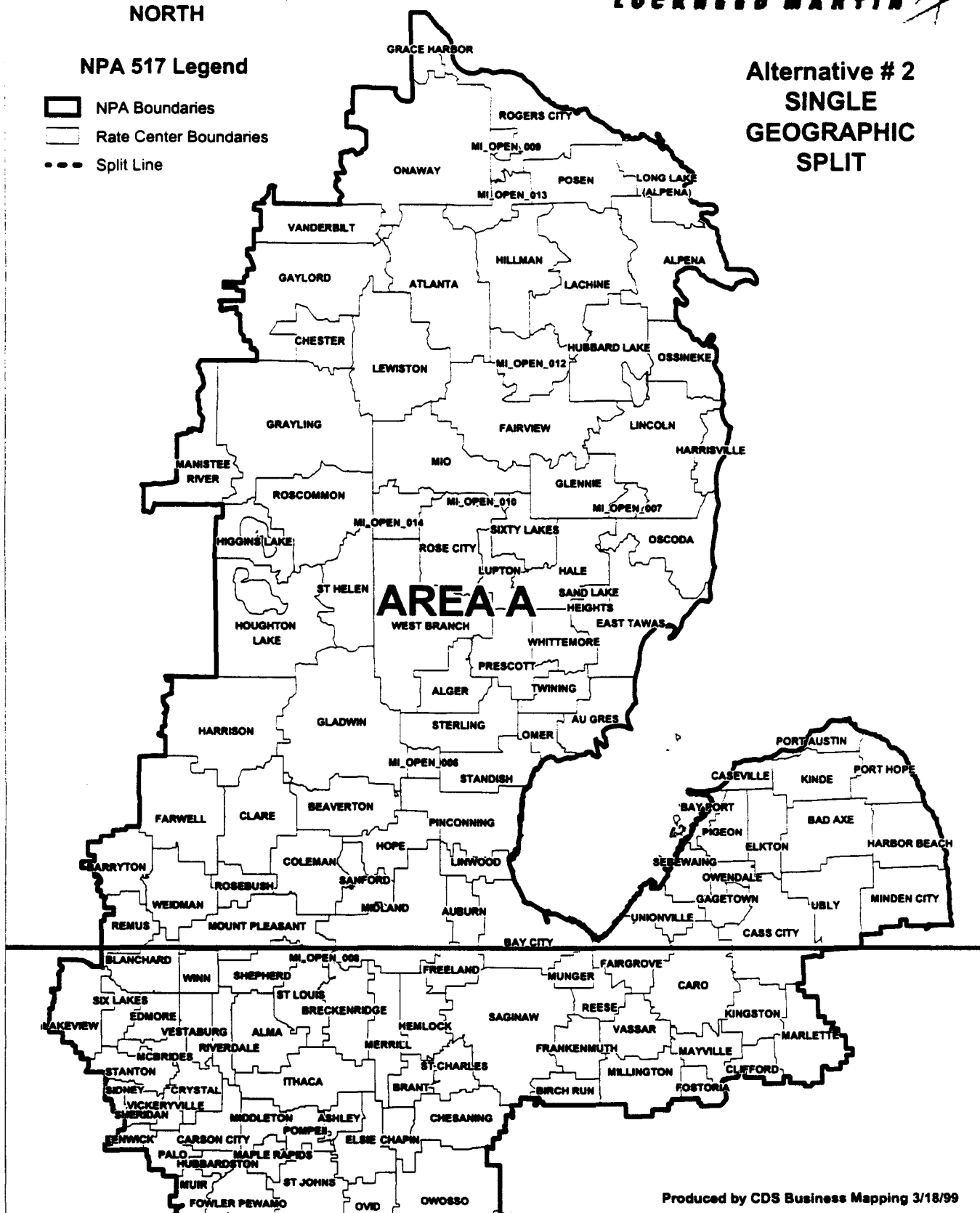




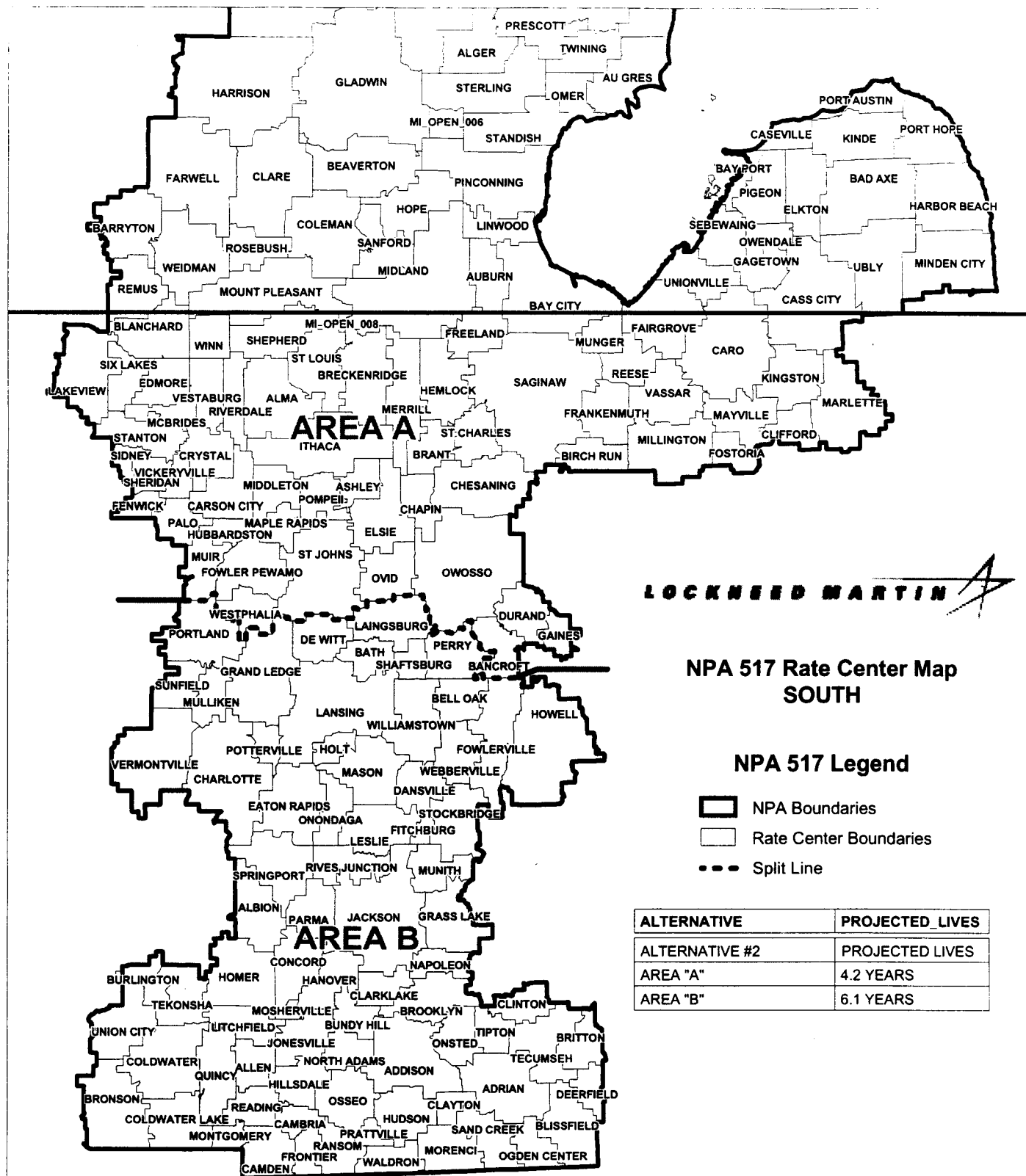
LOCKHEED MARTIN

**Alternative # 2
SINGLE
GEOGRAPHIC
SPLIT**

-  NPA Boundaries
 Rate Center Boundaries
 Split Line



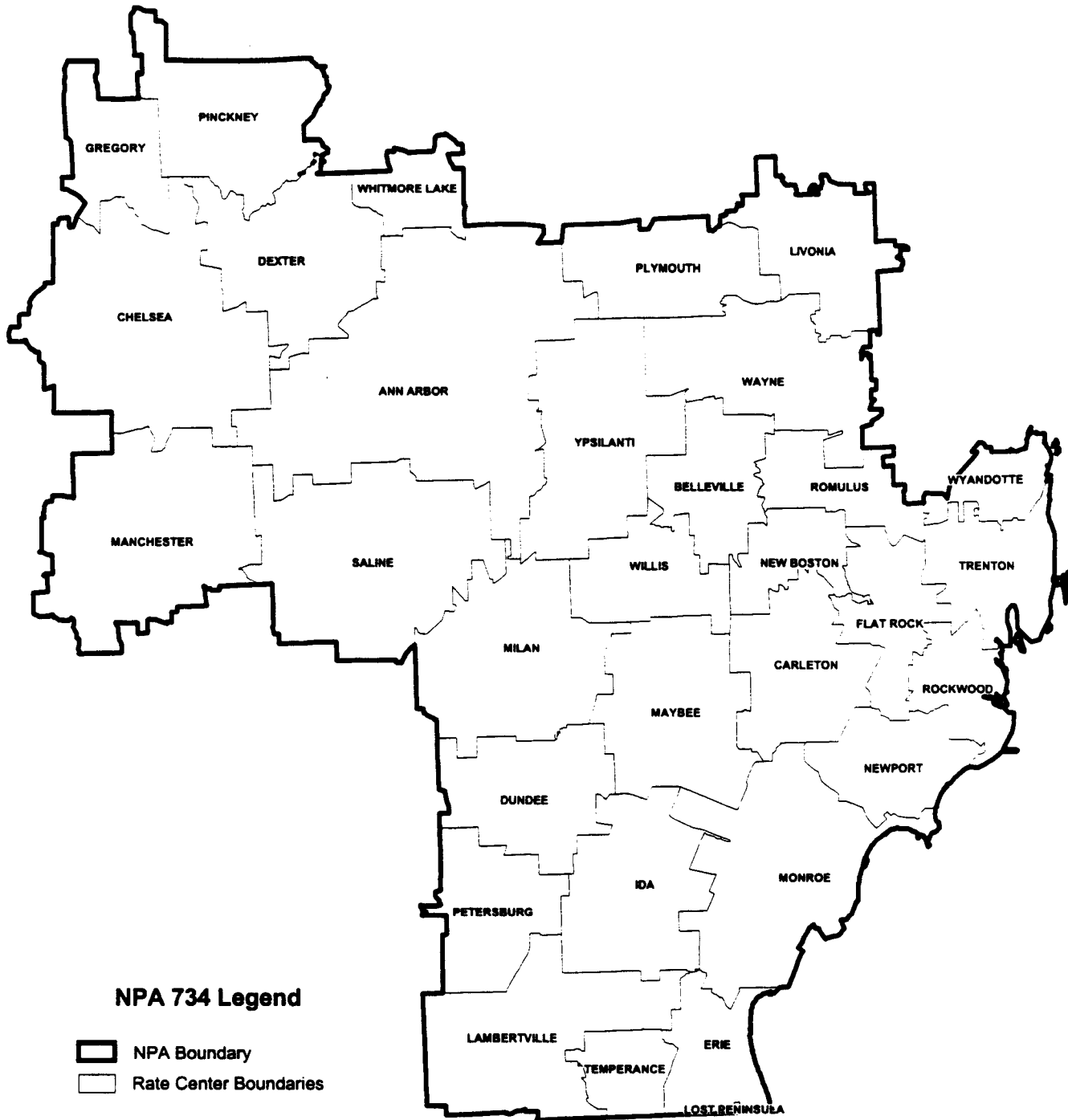
Produced by CDS Business Mapping 3/18/99



NPA 734 Rate Center Map

Alternative # 1 OVERLAY

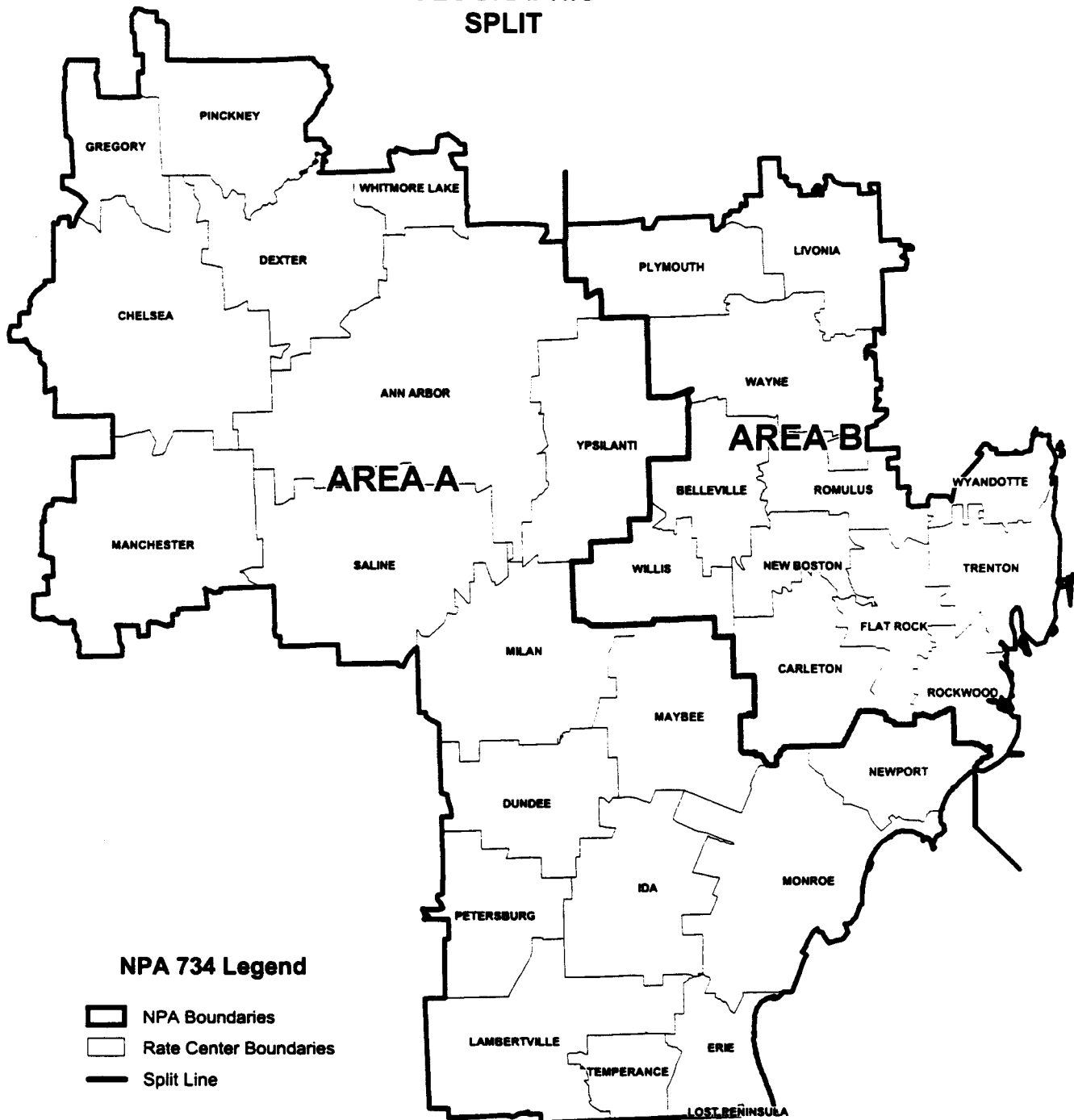
LOCKHEED MARTIN



NPA 734 Legend

- NPA Boundary
- Rate Center Boundaries

ALTERNATIVE	PROJECTED_LIVES
ALTERNATIVE #1	PROJECTED LIVES
OVERLAY	5.3 YEARS



NPA 734 Legend

- NPA Boundaries
- Rate Center Boundaries
- Split Line

ALTERNATIVE	PROJECTED_LIVES
ALTERNATIVE #2	PROJECTED LIVES
AREA "A"	5.3 YEARS
AREA "B"	5.2 YEARS